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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

In re

THE LITIGATION PRACTICE GROUP,
P.C.,

Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

Adv. No. 8-25-ap-01191-SC

**FOURTH STIPULATION TO CONTINUE
DEADLINES**

Complaint Filed: March 18, 2025
The Honorable Scott C. Clarkson

RICHARD A. MARSHACK, Trustee of
the LPG Liquidation Trust,

Plaintiff,

vs.

YNS FUNDING, LLC, et al.,

Defendants.

1 **PLEASE TAKE NOTICE** that Plaintiff and Chapter 11 Trustee Richard A. Marshack
2 (the “Trustee”) and Defendants YNS Funding, LLC (“YNS”), Aly Management, LLC (“Aly”) and
3 Yitzchok Blum (“Blum,” collectively, the “Defendants,” and together with the Trustee, the
4 “Parties”), hereby stipulate and agree (the “Stipulation”), through their respective counsel, as
5 follows:

6 A. On March 18, 2025, Plaintiff filed a Complaint for: (1) avoidance, recovery, and
7 preservation of 2-year actual fraudulent transfers; (2) avoidance, recovery, and preservation of 2-
8 year constructive fraudulent transfers; (3) avoidance, recovery, and preservation of 4-year actual
9 fraudulent transfers; (4) avoidance, recovery, and preservation of 4-year constructive fraudulent
10 transfers; (5) turnover; and (6) aiding and abetting against Blum. [Docket. No. 1].

11 B. The initial deadline for YNS, Aly, and Blum to respond to the Complaint was
12 April 28, 2025. [Docket No. 4].

13 C. On April 28, 2025, the Parties filed a stipulation extending YNS, Aly, and Blum’s
14 time to file and serve any response to the Complaint from April 28, 2025 to May 12, 2025 (“First
15 Stipulation”) [Docket No. 10].

16 D. On April 29, 2025, the Court approved the Parties’ First Stipulation. [Docket No.
17 12].

18 E. On May 12, 2025, the Parties filed a stipulation extending the deadline for YNS,
19 Aly, and Blum to file and serve a response to Plaintiff’s Complaint from May 12, 2025 to July 7,
20 2025 and continuing the status conference in this case from May 30, 2025 at 1:30 p.m. to August
21 7, 2025 at 1:30 p.m. (“Second Stipulation”) [Docket No. 14].

22 F. On May 13, 2025, the Court approved the Parties’ Second Stipulation. [Docket No.
23 15].

24 G. On July 7, 2025, due to discussions between the Parties that could resolve this
25 matter without the need for further litigation, the Parties filed a stipulation extending the deadline
26 for YNS, Aly, and Blum to file and serve a response to Plaintiff’s Complaint from July 7, 2025 to
27 September 12, 2025 and to continue the status conference from August 7, 2025 to October 16,
28 2025 at 1:30 p.m. (“Third Stipulation”) [Docket No. 19].

H. On July 8, 2025, the Court approved the Parties' Third Stipulation. [Docket No. 21].

I. The Parties continue to engage in discussions and anticipate being able to resolve this matter without further litigation. Plaintiff therefore has agreed to continue the deadline for YNS, Aly, and Blum to serve a response to Plaintiff's Complaint from September 12, 2025 to **October 13, 2025**. Plaintiff has also agreed to continue the status conference in this case from October 16, 2025 at 1:30 p.m. to **November 13, 2025** at 1:30 p.m.

STIPULATION

WHEREFORE, based on the above and the foregoing, the Parties stipulate and agree as follows:

1. The deadline for YNS Funding, LLC, Aly Management, LLC, and Yitzchok Blum to file and serve any response to Plaintiff's Complaint shall be continued to **October 13, 2025**.


2. The status conference in this case shall be continued to **November 13, 2025** at 1:30 p.m.

IT IS SO STIPULATED.

Dated: September 9, 2025

DINSMORE & SHOHL LLP

By



Christopher B. Ghio

Special Counsel to Richard A. Marshack, Trustee
of the LPG Liquidation Trust

Dated: September 9, 2025


PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Ira D. Kharasch
Ira D. Kharasch

1 Dated: September 9, 2025

**MORVILLO ABRAMOWITZ GRAND IASON &
ANELLO P.C.**

2
3 By



Christopher B. Harwood (*pro hac vice* application
forthcoming)

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6 Attorneys for YNS Funding, LLC, Aly
Management, LLC and Yitzchok Blum
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
700 Louisiana Street, Suite 4500, Houston, TX 77002

A true and correct copy of the foregoing document entitled (*specify*): **FOURTH STIPULATION TO CONTINUE DEADLINES** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **September 10, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Christopher Ghio** christopher.ghio@dinsmore.com, angelica.urena@dinsmore.com
- **Ira David Kharasch** ikharasch@pszjlaw.com
- **Richard A Marshack (TR)** pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
- **Victoria Newmark** vnewmark@pszjlaw.com, hdaniels@pszjlaw.com; bdassa@pszjlaw.com; hwinograd@pszjlaw.com
- **United States Trustee (SA)** ustpreion16.sa.ecf@usdoj.gov

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

9/10/25
Date

Hope R. Daniels
Printed Name

/s/ Hope R. Daniels
Signature